

**IN THE UNITED STATES BANKRUPTCY COURT**  
**Middle District of Tennessee**

<b>In the Matter of:</b>	}	
GREGORY KYLE WILLIAMS	}	Case No. 3:14-bk-04911
1003-B KINGSTON SPRINGS RD	}	Chapter 13
KINGSTON SPRINGS, TN 37082	}	Judge HARRISON
	}	
Debtor	}	
SSN: xxx-xx-7510	}	

**RESPONSE TO 9013 MOTION TO DISMISS**  
**FOR FAILURE OF DEBTOR TO FUND PLAN**

**DEADLINE FOR A TIMELY RESPONSE IS: *December 31, 2015.***

**THE HEARING WILL BE HELD: *January 20, 2016, at 8:30 a.m. in Courtroom 1, U.S. Customs House, 701 Broadway, Nashville, TN 37203***

Comes the Debtor by and through the undersigned counsel to answer the Motion to Dismiss filed by the Chapter 13 Trustee and states as follows:

1. The Debtor's Chapter 13 Plan requires Debtor make payments to the Trustee in the amount of \$223.50 bi-weekly.
2. The Debtor is approximately \$977 behind on Plan Payments to the Chapter 13 Trustee.
3. The Debtor has returned to work following medical leave.
4. The Debtor will remit to the Chapter 13 Trustee the appropriate funds to bring the Plan current before the hearing date or the new payroll deduction will increase to allow the Plan to complete within 60 months.

THEREFORE, the Debtor would ask that the Motion to Dismiss for Failure of Debtor to Fund Plan be denied and the case be allowed to go forward.

Respectfully Submitted,

/S/MARK PODIS

Mark R. Podis (BPR #012216)

Attorney for Debtor

1161 Murfreesboro Road Suite 300

Nashville, TN 37217

Phone (615) 399-3800

Fax (615) 399-9794

Email – PodisBankruptcy@aol.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Response has been delivered to the US Trustee for the Middle District of Tennessee, 701 Broadway, 318 Customs House, Nashville, TN 37203, to the Chapter 13 Trustee, PO Box 340019, Nashville, TN 37203-0019, and mailed to the debtor, GREGORY WILLIAMS, 1003-B KINGSTON SPRINGS RD, KINGSTON SPRINGS, TN 37082, and to all creditors and parties in interest via CM/ECF @ <http://ecf.tnmb.uscourts.gov> on this December 17, 2015.

/S/MARK PODIS

Mark Podis

**A TOTAL OF 45 COPIES HAVE BEEN MAILED FIRST CLASS PER THE ATTACHED MAILING LIST.**